

REBECCA L. MASTRANGELO, ESQ.  
Nevada Bar No. 5417  
ROGERS, MASTRANGELO, CARALHO & MITCHELL  
700 South Third Street  
Las Vegas, Nevada 89101  
Telephone: (702) 383-3400  
Facsimile: (702) 384-1460  
[rmastrangelo@rmcmlaw.com](mailto:rmastrangelo@rmcmlaw.com)

SU-LYN COMBS (*PRO HAC VICE*)  
TUCKER ELLIS LLP  
515 South Flower Street  
Forty-Second Floor  
Los Angeles, CA 90071  
Telephone: (213) 430-3400  
Facsimile: (213) 430-3409  
[su-lyn.combs@tuckerellis.com](mailto:su-lyn.combs@tuckerellis.com)

VASUDHSIRI SATHIENMARS (*PRO HAC VICE*)  
TUCKER ELLIS LLP  
201 Mission Street, Suite 2310  
San Francisco, CA 94105  
Telephone: (415) 617-2400  
Facsimile: (415) 617-2409  
[vasudhsiri.sathienmars@tuckerellis.com](mailto:vasudhsiri.sathienmars@tuckerellis.com)

Attorneys for Defendant  
*OTIS ELEVATOR COMPANY*

**UNITED STATES DISTRICT COURT**  
**DISTRICT OF NEVADA**

MARIA CHAIDEZ DE HERRERA,  
individually,

Plaintiff,

v.

OTIS ELEVATOR COMPANY, a foreign  
corporation; TK ELEVATOR  
CORPORATION, a domestic corporation; TK  
ELEVATOR CORPORATION, a foreign  
corporation; TK ELEVATOR  
MANUFACTURING, INC., a foreign  
corporation; DOES 1 through 30, inclusive; and  
ROE BUSINESS ENTITIES 4 through 30,  
inclusive,

Defendants.

Case No. 2:24-cv-01122-GMN-BNW

**STIPULATION FOR  
DISMISSAL WITH PREJUDICE  
OF CERTAIN CAUSES OF  
ACTION AGAINST  
DEFENDANT OTIS ELEVATOR  
COMPANY**

**IT IS HEREBY STIPULATED AND AGREED**, by all parties, by and through their respective counsel of record, that pursuant to Federal Rule of Civil Procedure 41, that certain causes of actions against Defendant Otis Elevator Company be dismissed with prejudice as follows:

1. Plaintiff's First Cause of Action for Negligence is dismissed with prejudice as to Defendant Otis Elevator Company.
2. Plaintiff's Second Cause of Action for Negligence – Res Ipsa Loquitur is dismissed with prejudice as to Defendant Otis Elevator Company.
3. Plaintiff's Fourth Cause of Action for Negligent Hiring, Training Supervision, Contracting, and/or Retention is dismissed with prejudice as to Defendant Otis Elevator Company.
4. Plaintiff's Fifth Cause of Action for Respondeat Superior is dismissed with prejudice as to Defendant Otis Elevator Company.
5. Plaintiff's Sixth Cause of Action for Breach of Warranty is dismissed with prejudice as to Defendant Otis Elevator Company.

This stipulation does not impact any claims or causes of action against TK Elevator Corporation or TK Manufacturing, Inc.

Respectfully Submitted By:  
TUCKER ELLIS, LLP

*/s/ Su-Lyn Combs*

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SU-LYN COMBS, ESQ.  
VASUDHSIRI T. SATHIENMARS, ESQ.  
TUCKER ELLIS LLP  
515 South Flowers Street, 42<sup>nd</sup> Floor  
Los Angeles, CA 90071

*Attorneys for Defendant Otis Elevator Co.*

Respectfully Submitted By:  
BERTOLD CARTER SMITH & CULLEN

*/s/ Paul R.M. Cullen*

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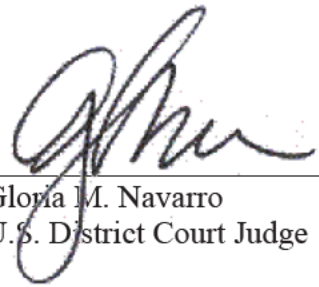
PAUL R.M. CULLEN ESQ.  
Nevada Bar No. 12355  
7405 West Sahara Avenue  
Las Vegas, NV 89117

*Attorneys for Plaintiff*

**ORDER**

Based on the parties' stipulation [ECF No. 49] and good cause appearing, IT IS ORDERED that Plaintiff's First, Second, Fourth, Fifth and Sixth Causes of Action are Dismissed with Prejudice as to Defendant Otis Elevator Company.

Dated this 4 day of June, 2025.



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Gloria M. Navarro  
U.S. District Court Judge

**CERTIFICATE OF SERVICE**

I certify that on the 3rd day of June, 2025, the foregoing was served upon the following counsel of record via electronic mail:

Paul R.M. Cullen, Esq. Lindsay Cullen, Esq. BERTOLDO CARTER SMITH & CULLEN 7408 W. Sahara Avenue Las Vegas, NV 89117 Tel.: (702) 228-2600 Fax: (702) 228-2333 Email: <a href="mailto:paul@nvlegaljustice.com">paul@nvlegaljustice.com</a> <a href="mailto:lindsay@nvlegaljustice.com">lindsay@nvlegaljustice.com</a>  <i>Attorneys for Plaintiff</i>	Pamela A. McKay, Esq. MCKAY LAW FIRM, CHTD. 8440 W. Lake Mead Blvd., Ste. 112 Las Vegas, Nevada 89128 Tel.: (702) 835-6956 Fax: (702) 835-6957 Email: <a href="mailto:pmckay@mckaylawfirmchtd.com">pmckay@mckaylawfirmchtd.com</a>  <i>Attorneys for Defendant  TK Elevator Corporation, TK Elevator  Corporation, and TK Elevator Manufacturing,  Inc.</i>
Rebecca L. Mastrangelo, Esq. Nevada Bar No. 5417 ROGERS, MASTRANGELO, CARVALHO & MITCHELL 700 South Third Street Las Vegas, Nevada 89101 Tel.: (702) 383-3400 Fax (702) 384-1460 Email: <a href="mailto:rmastrangelo@rmcmlaw.com">rmastrangelo@rmcmlaw.com</a>  <i>Attorneys for Defendant  Otis Elevator Company</i>	Bradley J. Johnston, Esq. (Pro Hac Vice) The Cavanagh Law Firm, P.A. 1850 N. Central Ave., Ste. 1900 Phoenix, AZ 85004 Tel.: (602) 322-4000 Fax: (602) 322-4100 Email: <a href="mailto:bjohnston@cavanaghlaw.com">bjohnston@cavanaghlaw.com</a>  <i>Attorneys for Defendant  TK Elevator Corporation, TK Elevator  Corporation, and TK Elevator Manufacturing,  Inc.</i>

/s/: Stella S. Villegas

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An employee of Tucker Ellis LLP